

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

MINH NGUYET LUONG,

Petitioner,

V.

THE EIGHTH JUDICIAL
DISTRICT COURT OF THE STATE
OF NEVADA, IN AND FOR THE
COUNTY OF CLARK, AND THE
HONORABLE DAWN THRONE,
DISTRICT COURT JUDGE,

Respondents,

JAMES W. VAHEY,

Real Party in Interest.

**REAL PARTY IN INTEREST, JAMES W. VAHEY’S, MOTION FOR
PERMISSION TO FILE ANSWER EXCEEDING THE PAGE LIMIT SET
FORTH IN NRAP 21(d)**

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Real Party in Interest, JAMES W. VAHEY (“Jim”), by and through his attorneys, Robert P. Dickerson, Esq., and Sabrina M. Dolson, Esq., of The Dickerson Karacsonyi Law Group, hereby moves this Court to permit him to file his Answer to Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e) (“Answer”), which exceeds the page limits set forth in NRAP 21(d).

I. FACTUAL BACKGROUND AND PROCEDURAL STATEMENT

Petitioner, MINH NGUYET LUONG (“Minh”), filed her Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e) (“Petition”) on April 8, 2022. Minh simultaneously filed a Motion to File “Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e)” in Excess of Fifteen Pages, requesting this Court allow her to file her Petition, which was a total of 79 pages in length. The fact section in Minh’s Petition is approximately 38 pages alone. As set forth in Minh’s Motion, the underlying record in this case consists of 21 volumes and the background facts are extensive. In order to provide a complete response to Minh’s Petition, Jim requests the Court allow him to file his Answer in excess of the page limitation set forth in NRAP 21(d).

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II. LEGAL ARGUMENT

NRAP 21(d) provides as follows:

(d) Form of Papers; Length; Number of Copies. All papers must conform to Rule 32(c)(2). An original and 2 copies shall be filed unless the court requires the filing of a different number by order in a particular case. A petition shall not exceed 15 pages unless it contains no more than 7,000 words (or 650 lines of text in a monospaced typeface) or the court grants leave to file a longer petition. **Unless the court directs otherwise, the same page and type-volume limits apply to any answer, reply, or amicus brief allowed by the court.** A motion to exceed the page or type-volume limit in this rule must comply with Rule 32(a)(7)(D).

Emphasis added. Pursuant to the above rule, Jim respectfully requests that this Court permit him to file his Answer despite the fact that it contains approximately 12,251 words. In support of such a request, Jim respectfully submits that the underlying facts in this case are extensive and to be able to completely respond to Minh's Petition, which was a total of 79 pages in length, Jim had to exceed the page limit imposed by NRAP 21(d). Finally, Jim represents that he did not unnecessarily expand the statement of facts or legal argument contained in his Answer, and sought to the best of his ability to set forth same in as concise a manner as possible.

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III. CONCLUSION

Jim respectfully requests this Court permit him to file his Answer notwithstanding the fact that it exceeds the page limits permitted by NRAP 21(d).

DATED this 15^h day of April, 2022.

THE DICKERSON KARACSONYI
LAW GROUP

/s/ Sabrina M. Dolson

ROBERT P. DICKERSON, ESQ.

SABRINA M. DOLSON, ESQ.

Attorney for Real Party in Interest

CERTIFICATE OF COMPLIANCE

1. I hereby certify that this Motion for Permission to File Answer Exceeding the Page Limit Set Forth in NRAP 21(d) (“Motion”) complies with the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6), as required by NRAP 27(d)(1)(E), because this Motion has been prepared in a proportionally spaced typeface using WordPerfect X5 in 14 point Times New Roman type style.

2. I further certify that this Motion complies with the page and type-volume limitations of NRAP 27(d)(2) because it does not exceed ten (10) pages.

DATED this 15th day of April, 2022.

THE DICKERSON KARACSONYI
LAW GROUP

/s/ Sabrina M. Dolson

ROBERT P. DICKERSON, ESQ.

Nevada Bar No. 000945

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Attorneys for Real Party in Interest

CERTIFICATE OF SERVICE

I certify that I am an employee of THE DICKERSON KARACSONYI LAW GROUP, and that on this 15th day of April, 2022, I filed a true and correct copy of the foregoing REAL PARTY IN INTEREST, JAMES W. VAHEY'S, MOTION FOR PERMISSION TO FILE ANSWER EXCEEDING THE PAGE LIMIT SET FORTH IN NRAP 21(d) with the Clerk of the Court through the Court's eFlex electronic filing system and notice will be sent electronically by the Court to the following:

MARSHAL S. WILLICK, ESQ.
WILLICK LAW GROUP
3591 East Bonanza Road, Suite 200
Las Vegas, Nevada 89110
Attorney for Petitioner, MINH NGUYET LUONG
email@willicklawgroup.com

I further certify that on this day a copy of the foregoing document will also be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage is prepaid, in Las Vegas, Nevada, addressed to the following:

HONORABLE DAWN THRONE
Eighth Judicial District Court, Department U
601 North Pecos Road
Las Vegas, Nevada 89155

/s/ Sabrina M. Dolson

An employee of The Dickerson Karacsonyi Law Group